

# Metro Communications Company, Inc.

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: 01/26/2011
2. Name of company(s) covered by this certification: Metro Communications Company, Inc
3. Form 499 Filer ID: 826756
4. Name of signatory: Zachary Horn
5. Title of signatory: President
6. Certification:

I, Zachary Horn, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.


*See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (if applicable)  
Summary of customer complaints (if applicable)

**Metro Communication Comp., Inc.**  
**Statement of CPNI Procedures and Compliance**

Metro Communication Comp., Inc. ("Metro Communication Comp.") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, Metro Communication Comp. does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Metro Communication Comp. does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. Metro Communication Comp. typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

Metro Communication Comp. may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Metro Communication Comp. provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Metro Communication Comp. is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Metro Communication Comp. safeguards from improper use or disclosure by employees the call detail information that Metro Communication Comp. obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Metro Communication Comp. has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Metro Communication Comp. computers and call detail records. In the event of unauthorized CPNI access, Metro Communication Comp. will notify the requisite law enforcement agencies, and the customer when possible.

Metro Communication Comp. did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Metro Communication Comp. does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Metro Communication Comp., it cannot notify those end-user customers directly if a breach occurs. However, Metro Communication Comp. has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.